## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

IN RE: ATRIUM MEDICAL CORP. C-QUR MESH PRODUCTS LIABILITY LIGITATION Master File No. 1:16-md-02753-LM MDL No. 2753

THIS DOCUMENT RELATES TO:

LANDYA B. MCCAFFERTY U.S. DISTRICT JUDGE

**ALL CASES** 

## MOTION TO ESTABLISH A QUALIFIED SETTLEMENT FUND AND ISSUE RELATED ORDERS

Plaintiffs in the above Captioned MDL by and through Lead Counsel hereby respectfully move this Court, for the reasons specified in the attached Memorandum of Law to establish a Qualified Settlement Fund and issue related orders.

DATED: December 10, 2021

Respectfully submitted,

/s/ Jonathan D. Orent, Esq. Jonathan D. Orent MOTLEY RICE LLC 55 Cedar Street, Suite 100 Providence, RI 02903 401-457-7700 401-457-7708 Fax jorent@motleyrice.com

Plaintiffs' Lead Counsel

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has this date been filed electronically with the Clerk of Court using the CM/ECF system. Notice of these filings will be sent to all counsel of record and parties by operation of the Court's electronic filing system.

/s/ Jonathan D. Orent Jonathan D. Orent